

# Exhibit 1

**From:** Norris, Ellie  
**Sent:** Thursday, September 16, 2021 3:07 PM  
**To:** Stephen Whaley <[whaley@csdisco.com](mailto:whaley@csdisco.com)>  
**Cc:** Valsartan <[valsartan@csdisco.com](mailto:valsartan@csdisco.com)>; Layne Hilton <[l.hilton@kanner-law.com](mailto:l.hilton@kanner-law.com)>; David J. Stanoch <[d.stanoch@kanner-law.com](mailto:d.stanoch@kanner-law.com)>  
**Subject:** RE: Valsartan MDL - McK Productions

I've attached the previous emails with the passwords to volumes 2, 3, and 4 here.

**Ellie Norris** | Associate  
Norton Rose Fulbright US LLP  
2200 Ross Avenue, Suite 3600, Dallas, Texas 75201-7932, United States  
Tel +1 214 855 8074 | Fax +1 214 855 8200  
[ellie.norris@nortonrosefulbright.com](mailto:ellie.norris@nortonrosefulbright.com)

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**From:** Norris, Ellie  
**Sent:** Thursday, September 16, 2021 3:05 PM  
**To:** Stephen Whaley <[whaley@csdisco.com](mailto:whaley@csdisco.com)>  
**Cc:** Valsartan <[valsartan@csdisco.com](mailto:valsartan@csdisco.com)>; Layne Hilton <[l.hilton@kanner-law.com](mailto:l.hilton@kanner-law.com)>; David J. Stanoch <[d.stanoch@kanner-law.com](mailto:d.stanoch@kanner-law.com)>  
**Subject:** RE: Valsartan MDL - McK Productions

Hi Stephen,

I've reattached the emails with our production volumes 2, 3, and 4 here. The volume passwords will come in a separate email. Please advise if you can download from these old links, or if I need to get those volumes reproduced to the FTP site for you.

Ellie

**Ellie Norris | Associate**  
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**From:** Stephen Whaley [<mailto:whaley@csdisco.com>]  
**Sent:** Thursday, September 16, 2021 2:59 PM  
**To:** Norris, Ellie <[ellie.norris@nortonrosefulbright.com](mailto:ellie.norris@nortonrosefulbright.com)>  
**Cc:** Valsartan <[valsartan@csdisco.com](mailto:valsartan@csdisco.com)>; Layne Hilton <[l.hilton@kanner-law.com](mailto:l.hilton@kanner-law.com)>; David J. Stanoch <[d.stanoch@kanner-law.com](mailto:d.stanoch@kanner-law.com)>  
**Subject:** Re: Valsartan MDL - McK Productions

Thanks I really appreciate your assistance.

Regards,

Stephen Whaley | Project Analyst



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3700 N. Capital of Texas Highway, Suite 150 Austin TX 78746 USA  
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On Thu, Sep 16, 2021 at 2:58 PM Norris, Ellie <[ellie.norris@nortonrosefulbright.com](mailto:ellie.norris@nortonrosefulbright.com)> wrote:

Hi Stephen,

I will check which production volumes those are and resend the link to the download. They were sent a while ago, so I'm hopeful the production links will still work. If not, we will need our Practice Support Group to reproduce those productions to the FTP site. I'll circle back with you shortly and resend those previous production emails.

Ellie

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ellie.norris@nortonrosefulbright.com

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**From:** Stephen Whaley [mailto:[whaley@csdisco.com](mailto:whaley@csdisco.com)]  
**Sent:** Thursday, September 16, 2021 2:46 PM  
**To:** Norris, Ellie <[ellie.norris@nortonrosefulbright.com](mailto:ellie.norris@nortonrosefulbright.com)>  
**Cc:** Valsartan <[valsartan@csdisco.com](mailto:valsartan@csdisco.com)>; Layne Hilton <[l.hilton@kanner-law.com](mailto:l.hilton@kanner-law.com)>; David J. Stanoch <[d.stanoch@kanner-law.com](mailto:d.stanoch@kanner-law.com)>  
**Subject:** Re: Valsartan MDL - McK Productions

### **[External Email – Use Caution]**

Hi Ellie,

I am following up on this. Are you able to provide the requested productions?

Regards,

**Stephen Whaley** | Project Analyst



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On Wed, Sep 15, 2021 at 12:18 PM Stephen Whaley <[whaley@csdisco.com](mailto:whaley@csdisco.com)> wrote:

Hi Ellie,

My name is Stephen Whaley with DISCO's project management team. We are reaching out for the Valsartan matter. It appears we are missing a few productions with the bates range MCK00000744 - MCK00001785. Are you able to provide these missing productions so that we can get them uploaded for review?

Regards,

**Stephen Whaley** | Project Analyst



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**From:** Norris, Ellie <ellie.norris@nortonrosefulbright.com>  
**Sent:** Monday, September 14, 2020 6:41 PM  
**To:** Honik, Ruben; Adam Slater; Conlee Whiteley; Daniel Nigh  
**Cc:** Davis, D'Lesli M.; Norris, Ellie  
**Subject:** In re Valsartan, Losartan, and Irbesartan Products Liability Litigation, MDL 2875 - McKesson's Responses to Requests for Production - Volume 2 Password

September 14, 2020

***Re: IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION, MDL No. 2875.***

Counsel:

As noted in my previous email, the volume password to access MCK00000744 – MCK00001304 on the SFTP site is:

9CX6d=N,y>Q2NfZ~

Best,  
Ellie

**Ellie Norris** | Associate  
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ellie.norris@nortonrosefulbright.com

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**From:** Norris, Ellie <ellie.norris@nortonrosefulbright.com>  
**Sent:** Tuesday, October 13, 2020 7:01 PM  
**To:** Honik, Ruben; Adam Slater; Conlee Whiteley; Daniel Nigh  
**Cc:** Davis, D'Lesli M.; Norris, Ellie  
**Subject:** In re Valsartan, Losartan, and Irbesartan Products Liability Litigation, MDL 2875 - McKesson's First Amended Responses to Requests & Production Vol. 3

October 13, 2020

***Re: IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION, MDL No. 2875.***

Counsel:

As noted in my previous email, the volume password to access MCK00001305 – MCK00001712 on the SFTP site is:

8XnQLE)#f9&\$zw6e

Best,  
Ellie

**Ellie Norris** | Associate  
Norton Rose Fulbright US LLP  
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Tel +1 214 855 8074 | Fax +1 214 855 8200  
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**From:** Norris, Ellie <ellie.norris@nortonrosefulbright.com>  
**Sent:** Wednesday, November 25, 2020 8:58 PM  
**To:** Honik, Ruben; Adam Slater; Conlee Whiteley; Daniel Nigh  
**Cc:** Davis, D'Lesli M.; Norris, Ellie  
**Subject:** RE: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation, MDL 2875 - McKesson's First Amended Responses to Requests & Production Vol. 4

November 25, 2020

***Re: IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION, MDL No. 2875.***

Counsel:

As noted in my previous email, the volume password to access MCK00001713 - MCK00001785 on the SFTP site is:

BIAz0TCFSTh2rNoW

Best,  
Ellie

**Ellie Norris** | Associate  
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